

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VAL POPESCU,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:08CV3406
)	
4ACCESS COMMUNICATIONS)	
COMPANY, a Delaware corporation,)	
And DOES 1-10, Inclusive,)	
)	
Defendants.)	
)	
)	
)	

REPORT OF PARTIES' PLANNING MEETING
(FRCP 26(f))

1. Pursuant to Fed.R.Civ.P. 26(f), a telephonic meeting of counsel was held on July 24, 2008 and was attended by Gregory P. Goonan on behalf of plaintiff Val Popescu and Jeffrey D. Corso on behalf of defendant 4Access Communications Company.
2. Pre-Discovery Disclosures. The parties will exchange by August 29, 2008 the information required by Fed.R.Civ.P. 26(a)(1).
3. Discovery Plan. The parties jointly propose to the court the following discovery plan:
 - a. Discovery will be needed on all allegations of the plaintiff's complaint, the defendant's denial of such allegations, and the affirmative defenses raised by the defendant.
 - b. All discovery will be commenced in time to be completed by December 31, 2008.
 - c. There will be a reasonable number of interrogatories, not to exceed 50 interrogatories including subparts. Responses will be due 30 days after service.

d. There will be a maximum of 10 depositions per party, each limited to a maximum of 7 hours unless extended by agreement of the parties, as provided by Fed.R.Civ.P. 30.

4. Other Items.

a. The parties request a pretrial conference in January 2008.

b. The parties should be allowed until November 3, 2008 to file a motion to join additional parties and/or amend the pleadings.

c. All potentially dispositive motions should be filed by January 16, 2008.

d. The parties believe that settlement of this case ultimately is likely but that they will need to take discovery before engaging in meaningful settlement discussions.

e. This case should be ready for trial by April 2009 and at this time is expected to take approximately one week.

f. The parties request that the court hold a status conference in mid-January 2009 to establish an expert disclosure schedule, to address settlement issues, and to establish a schedule for the disclosures required pursuant to Fed.R.Civ.P. 26(a)(3).

g. The plaintiff expects that entry of a protective order will be required to protect the confidentiality of documents and information that will be sought in discovery, and believes that the parties will be able to stipulate to an appropriate protective order.

Dated: August 4, 2008

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Certificate of Service

The undersigned hereby certifies that on this 4th day of August 2008, a true and accurate copy of the attached was electronically filed with the Court, to be served by operation of the Court's electronic filing system, upon the following:

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